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U.S. Postal Regulatory Commission
901 New York Ave. Suite 200
Washington, DC 20268-0001

RE: Determination to Close the Viola, ID Post Office – Docket # 1386031-83872

POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

Dear Commission:

I am writing to appeal the decision by the Postal Service (PS) to close the Viola, ID Post Office (V.P.O). In addition, I will use the recent construction activity at the V.P.O. to suggest an alternative approach to reducing the PS red ink.

The following are points I trust you will take into account when considering my appeal.

1. The PS violated 39 USC 404 by not providing adequate notice of its intent to close the Viola P.O. **Even though the PS indicated it mailed 225 notices, more than 25% of the customers being served by the V.P.O. did not receive any notice of the PS's intent to close the V.P.O., including the owners of the building that the PS leases space from. Further, of the 82 questionnaires returned 69 respondents, an overwhelming majority, indicated closing the V.P.O will adversely impact them.**
2. Closing the V.P.O will have a devastating impact on the local community. **The PS responses to the concerns of the community were inadequate when addressing such things as disabilities, weather, individuals cost associated with traveling to another Post Office, if additional tasks are added to the rural carrier's current workload, that the carrier will not be able to provide a maximum degree of effective and regular postal services currently received from the V.P.O., and the fact that there are no commercial storefront businesses in Viola means a Community Post Office is not a viable alternative.**
3. Closing the V.P.O, will impact the employee currently working for the P.S. **The P.S. used the rational that the V.P.O. currently does not have a Postmaster so there will be minimum employee impact. Never the less, the one person currently working at the V.P.O. will lose her lively hood.**
4. Closing the V.P.O will go against other government programs in place to sustain rural communities. **USDA is promoting rural community development. Closing the V.P.O goes against Government's emphasis on supporting rural communities.**
5. Closing the V.P.O. will disrupt mail service for those who have a mail box within the Post Office. **One of the concerns raise was the disruption caused by a change in a persons' address. Response # 9 in the Docket indicated there would be "no change in the customers address". However item 3 of the disadvantages indicates there will be "a change in the mailing address and a carrier address will be assigned". That sounds like a disruption to me.**
6. The advantages of closing the V.P.O. are weak at best. **Customers choose to go to the Post Office they don't "need" to go. Customers already have 24/7 service with the existing Post Office so carrier service does improve on that. Closing the V.P.O. will provide minimal savings to the PS. The V.P.O currently provides "CBUs" inside the V.P.O. The PS is proposing to install CBUs, but doesn't say where, how many or at what cost for construction and maintenance.**

7. The disadvantages of closing the V.P.O are more adverse than indicated. **Relying on the rural carrier for retail outlet services is not practical for many customers. The rural carrier route schedule is not exact, so meeting the rural carrier at the rural box would be very time consuming and impractical in inclement weather. And yes it will be a huge disadvantage to change my mailing address. And the disadvantage of increasing my PO Box Fee for less service is not acceptable.**
8. And finally closing the V.P.O will provide the P.S. with a minimal cost savings. **The PS estimates there will be an annual cost savings of \$28,873, \$3,414 lease cost and the remainder is salary. If the V.P.O is closed, the customers will have to use the PO in Moscow, ID. That PO is notorious for long lines, poor customer service and limited parking. The additional work load at the Moscow PO will necessitate the hiring of an additional employee and thus there will be Zero savings in salary. Therefore closing the V.P.O will only save the P.S. \$3,418 annually.**

One must ask the question: Is an annual savings of \$3,418 a valid reason to close the Viola Post Office? Your answer must clearly be NO.

I indicated there may be alternatives to closing post offices that will reduce PS expenses. It appears that various branches of the PS don't communicate with each other. The PS began assessing the closure of the V.P.O. in June. In August a contractor from Helena, Montana, 352 miles away, showed up in Viola and began upgrading the disability access to the Post office. During several trips over the course of Aug, Sept and Oct the contractor installed a cement handicap ramp, hand rails, cement handicap parking slab, modified the counter for handicap accessibility, installed handicap doorknobs and modified the bathroom to make it handicap compliant. If you add up mileage, per diem, salaries, and construction material costs that is a significant expense to the PS. All of which will be wasted if the Viola Post Office is closed.



How many of the other 3,500 Post Offices slated for closure received upgrades? If the PS installs CBUs in Viola, will the contractor come from Helena? Instead of balancing the PS budget on the backs of the rural community customers, perhaps the PS should cut out the construction waste instead. At a minimum there are many out of work contractors only 10 miles away in Moscow that could have completed this work.

Please do whatever is in your jurisdiction to stop the Postal Service from closing the Viola Post Office!

Regards and thank you.

Date of Posting: 10/14/2011

Date of Removal: 11/15/2011

FINAL DETERMINATION TO CLOSE
THE VIOLA, ID POST OFFICE
AND EXTEND
SERVICE BY RURAL ROUTE SERVICE

DOCKET NUMBER 1386031 - 83872

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is issuing the final determination to close the Viola, ID Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Moscow Post Office, located seven miles away. Service will be provided to cluster box units (CBUs).

CBUs are secure free-standing units of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. A parcel locker may also be installed.

The postmaster position became vacant when the postmaster retired on August 31, 2003. Since the postmaster vacancy an OIC has been installed to operate the office. Postmaster level and office service hours are determined by a workload analysis which includes the number of deliveries and revenue.

The office was studied for possible closing or consolidation due to the following reasons: Viola earns under two work hours per day. The Postal Service can provide regular and effective service from the Moscow ID Main Post Office 7 miles south via rural route carrier. Retail service is also available at the Palouse WA Post Office 6 miles to the northwest. Many Viola customer commute to Moscow ID for work and shopping.

The Viola Post Office, an EAS-55 level, provides service from 10:00 - 16:00 Monday - Friday, 10:00 - 16:00 Saturday and lobby hours of 24 on Monday - Friday and 24 on Saturday to 54 post office box or general delivery customers and no delivery customers. Retail services included the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.

The retail window averaged nine transaction(s) accounting for 10 minute(s) of retail workload daily. With minimal workload, the Postal Service feels that effective and regular service will be provided by rural route service. Office receipts for the last 3 years were: \$26,098 (68 revenue units) in FY 2008, \$26,618 (69 revenue units) in FY 2009; and \$26,782 (70 revenue units) in FY 2010. There were one permit mailer(s) or postage meter customer(s).

On June 23, 2011, representatives from the Postal Service were available at the Federal Building, 220 E. 5th St, Moscow ID 83843 to answer questions and provide information to customers. 21 customer(s) attended the meeting.

On June 08, 2011, 225 questionnaires were distributed to delivery customers of the Viola Post Office. Questionnaires were also available over the counter for retail customers at the Viola Post Office. 32 questionnaires were returned. Responses regarding the proposed alternate service were as follows: 1 favorable, 69 unfavorable, and 12 expressed no opinion.

When this final determination is implemented, delivery and retail services will be provided by the Moscow Post Office, an EAS-21 level office. Window service hours at the Moscow Post Office are from 8:00-17:00, Monday through Friday, and 9:30-13:30 on Saturday. There are 316 post office boxes available.

Retail service is also available at the Palouse Post Office an EAS-15 level office, located six miles away. Window service hours at Palouse Post Office are from 8:00-11:30-12:30-16:30, Monday through Friday and on Saturday. There are 167 post office boxes available for rent.

The proposal to close the Viola Post Office was posted with an invitation for comment at the Viola Post Office, Palouse Post Office and Moscow Post Office from July 05, 2011 to September 05, 2011. The following additional concerns were received during the proposal posting period:

1. Concern:

Customer expressed a concern about mailbox vandalism.

Response:

This is a problem that is experienced in many communities. Customers may install a heavier gauge metal box or brick veneer a mail box to make it resistant to vandalism. Customers should report mailbox vandalism to the county sheriff.

2. Concern:

Customer expressed a concern about the cost savings obtained by the Postal Service from the closure of Post Offices. Quoting the PRC which said if the Postal Service closed 1000 Post Offices, it would only save 0.7% of the postal budget.

Response:

The Postal Service has developed and begun implementing a range of cost-reducing initiatives. These include consolidating operations, adjusting delivery routes, restructuring administrative and processing functions and closing district offices. We also have introduced several new products and services, including Priority Mail Flat Rate boxes and Adult Signature service, in an effort to grow revenue.

3. Concern:

Customer expressed a concern about the inability of the rural carrier to weigh and rate letters and packages.

Response:

The rural carrier will accept any letters or packages up to 13 ounces for mailing. The carrier will estimate the cost and provide a receipt for any money received. On the following delivery day the carrier will provide change or a bill for the amount over the estimate.

4. Concern:

Customer expressed concern about a letter never reaching its destination.

Response:

We have no ability to respond to this concern.

5. Concern:

Customers expressed concern for those customers with disabilities who are not able to go to administrative Post Office to pick up their mail.

Response:

Customers are not required to travel to another Post Office to receive mail or obtain retail services. These services will be provided by the carrier to a roadside mailbox located close to customers' residences. In hardship cases, delivery can be made to the home of a customer. Changes in the type of delivery are considered where service by existing methods would impose an extreme physical hardship for an individual customer. Any request for a change in delivery method must be submitted in writing to the administrative postmaster.

6. Concern:

Customers expressed concern that postal employees at the administrative Post Office are rude.

Response:

Employee courtesy is always a concern of postal managers. Postal employees receive periodic instructions regarding employee courtesy. We do not condone our employees' execution of their duties in an unprofessional or discourteous manner. This concern will be conveyed to the postmaster by the Manager, Post Office Operations.

7. Concern:

Customers felt inclement weather and poor road conditions might impede delivery.

Response:

Both inclement weather and heavy mail volume can cause deviations from the normal delivery schedule. However, the carrier is required to provide a vehicle of adequate size, equipped with necessary equipment (chains or snow tires, warning lights or signs, etc.) to serve the route safely and efficiently and in accordance with federal, state, and local motor vehicle laws and regulations.

8. Concern:

Customers wanted to know why the customer lines were so long at the administrative Post Office.

Response:

The administrative Post Office serves a much larger community and has a heavier retail window workload. This concern has been brought to the attention of the administrative postmaster, window operations will be monitored to ensure that customers do not have an unreasonable wait to obtain services. The carrier can provide retail services, alleviating the need for customers to go to the Post Office for service.

9. Concern:

Customers were concerned about a possible address change.

Response:

There will be no change in customer addresses.

10. Concern:

Customers were concerned about having to travel to another Post Office for service.

Response:

Services provided at the Post Office will be available from the carrier, and customers will not have to travel to another Post Office for service. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Stamps are also available at many stores and gas stations where customers may already shop, online at usps.com, or by calling 1-800-STAMP-24.

11. Concern:

Customers were concerned about mail security.

Response:

Customers may place a lock on their mailboxes. The mailbox must have a slot large enough to accommodate the customer's normal daily mail volume. The Postal Service does not open mailboxes which are locked and does not accept keys for this purpose.

12. Concern:

Customers were concerned about obtaining services from the carrier.

- Response:**
- The rural carrier provides all the services that are available at the Post Office with the exception of PO Box service and bulk mail acceptance. This includes stamp sales, package pick up, special services and money order sales.
13. **Concern:**
- Customers were concerned about the limited hours of operation at the Post Office.
- Response:**
- Postmaster level and office service hours are determined by a workload analysis which includes the number of deliveries and revenue. A workload analysis indicated the office level had declined and qualified for for less hours of service per week. Carrier service will provide 24-hour access to the mail.
14. **Concern:**
- Customer suggested reducing/alternating the number of hours the post office operates.
- Response:**
- Hours are determined by the workload at the post office.
15. **Concern:**
- Customer suggested reducing/alternating the number of hours the post office operates.
- Response:**
- Hours are determined by the workload at the post office. Also, placement of a curbside box will be determined by the administrative office. Any questions about location can be worked out with the Postmaster.
16. **Concern:**
- Customer suggested reducing/alternating the number of hours the post office operates.
- Response:**
- Hours are determined by the workload at the post office. The hours at the Viola Post Office currently accomodate their workload.
17. **Concern:**
- Customers said they would miss the special attention and assistance provided by the personnel at the Post Office.
- Response:**
- Courteous and helpful service will be provided by personnel at the administrative Post Office and from the carrier. Special assistance will be provided as needed.
18. **Concern:**
- Customers were concerned about senior citizens.
- Response:**
- Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or Centralized Box Units. Customers do not have to make a special trip to the Post Office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
19. **Concern:**
- Customer was concerned that the decision to suspend had already been made.
- Response:**
- It was explained that this was the beginning of the process.
20. **Concern:**
- Customers asked why their Post Office was being discontinued while others were retained.
- Response:**
- Post Offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternate means.
21. **Concern:**
- Customers inquired about the location of the CPO
- Response:**
- The CPO will be located in the community. Convenience of location and accessibility will be considered in evaluating the bids and award of the contract.
22. **Concern:**
- Customers inquired about what hours and services would be provided by the CPO.
- Response:**
- The CPO will be contracted to provide at least the same hours as the present Post Office. Depending on the location, the CPO may provide expanded lobby hours. Services will be the same as provided at the Post Office, except for permit mail acceptance.
23. **Concern:**
- Customers were concered why the postmaster position was not filled.

Response:

All management positions were frozen in anticipation of the reorganization efforts.

24. Concern:

Customers were concerned about obtaining accountable mail and large parcels.

Response:

If the customer lives less than one-half mile from the line of travel, the carrier will attempt delivery of accountable items and large parcels to the customer's residence. If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox. Large parcels will be left outside the mailbox or at a location designated by the customer (if authorized by the customer), or a notice will be left in the mailbox. Attempted delivery items will be taken back to the Post Office. Customers may pick up the item at the Post Office or request redelivery online at usps.com or by calling 1-800-ASK-USPS.

Some advantages of the proposal are:

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.
4. A change in your PO Box Fees may be a result of this proposal.

Taking all available information into consideration, the Postal Service concludes this final determination will provide a maximum degree of effective and regular postal services to the community.

II. EFFECT ON COMMUNITY

Viola is an unincorporated community located in LATAH County. The community is administered politically by Latah County Commissioner. Police protection is provided by the Latah County Sheriff. Fire protection is provided by the Moscow Rural Fire Dept. The community is comprised of This community is comprised of retirees, farmers, loggers, commuters and ranchers. There is no employment in town, and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: There are no businesses in the service area. Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Viola Post Office will be available at the Moscow Post Office. Government forms normally provided by the Post Office will also be available at the Moscow Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

1. Concern:

Customers expressed concern for loss of community identity

Response:

A community's identity derives from the interest and vitality of its residents and their use of its name. The Postal Service is helping to preserve community identity by continuing the use of the Community name and ZIP Code in addresses.

2. Concern:

Customers questioned the economic savings of the proposed discontinuance. Concern was also expressed that too much money was spent in the larger cities.

- Response:** Carrier service can be and, in this case, is more cost-effective than maintaining a postal facility and a postmaster position. The Postal Service estimates an annual savings with this change. Additional funds are necessary in larger cities because of a greater workload. Larger cities often realize greater revenue which can offset their greater expenses.
3. **Concern:** Customers were concerned about growth in the community.
- Response:** The growth of a community does not depend on the location of a Post Office. Based on information obtained by the Postal Service, it was determined that there has been minimal growth in the area in recent years. Carrier service will be able to accommodate future growth.
4. **Concern:** Customers were concerned about the loss of a gathering place and an information center.
- Response:** Residents may continue to meet informally, socialize, and share information at the other businesses, churches and residences in town.
5. **Concern:** Customers felt the Post Office should remain open since they paid taxes.
- Response:** The Postal Service is not supported by tax dollars and must meet expenses by revenue it generates. Operational savings for the Postal Service contributes in the long run to stable postage rates and savings for customers.
6. **Concern:** Customers were concerned about loss of employment in the community.
- Response:** The postmaster position is vacant and there is no guarantee that any replacement postmaster would be from the community.
7. **Concern:** Customer expressed a concern about leaving money in the mailbox.
- Response:** A questionnaire was sent to the postal inspection service concerning mail theft and vandalism in the area. Their records indicate that there has not been any report of mail theft or vandalism in the area. However, customers may place a note in their mailboxes instructing the carrier to sound their horn when they arrive in order to transact financial business.
8. **Concern:** Customers expressed a concern about the loss of a bus stop at the Post Office.
- Response:** Customers may contact the county school board to determine if they would be willing to erect a small building, which would shelter children from the wind while they wait on the school bus. Or contact neighboring businesses to ascertain if they would allow children to wait on the bus at their business.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this final determination will not adversely affect the community.

III. EFFECT ON EMPLOYEES

The postmaster position became vacant when the postmaster retired on August 31, 2003. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected. Since the postmaster vacancy an OIC has been installed to operate the office.

IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of \$ 28,873 with a breakdown as follows:

Postmaster Salary (EAS-55, No COLA)	\$ 23,025
Fringe Benefits @ 33.5%	\$ 7,713
Annual Lease Costs	+ \$ 3,418
Total Annual Costs	\$ 34,156
Less Annual Cost of Replacement Service	- \$ 5,283
Total Annual Savings	<u>\$ 28,873</u>

A one-time expense of \$ 6000 will be incurred for the movement of this facility.

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

This is the final determination to close the Viola, ID Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Moscow Post Office, located seven miles away. Service will be provided to cluster box units (CBUs).

The postmaster retired on August 31, 2003. If the office has a noncareer PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. The mail volume has declined. Effective and regular service will continue to be provided by rural route service.

The Viola Post Office provided delivery and retail service to 54 PO Box or general delivery customers and no delivery route customers. The daily retail window transactions averaged nine. There are one permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$28,873 annually. A disadvantage to some will be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

VII. NOTICES

- A. Support Materials. Copies of all materials upon which this final determination is based are available for public inspection at the Viola Post Office, Palouse Post Office and Moscow Post Office during normal office hours.
- B. Appeal Rights. This final determination to close the Viola Post Office may be appealed by any person served by that office to the Postal Regulatory Commission at 901 New York Ave NW, Suite 200, Washington DC 20268-0001. Appeals must be received by the Commission within 30 days of the date this final determination is posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission or the parties to the appeal will be made available for public inspection at Viola Post Office, Palouse Post Office and Moscow Post Office during normal office hours.



Dean J Granholm
Vice President of Delivery and Post Office Operations

10/11/2011

Date